

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**DESIGNATION OF EXPERT WITNESSES BY TEXAS STATE
CONFERENCE OF NAACP BRANCHES AND THE MEXICAN AMERICAN
LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF REPRESENTATIVES**

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and to the Court's April 8, 2014, Amended Scheduling Order (ECF No. 231), Plaintiffs Texas State Conference of NAACP Branches ("Texas NAACP") and the Mexican American Legislative Caucus of the Texas House of Representatives ("MALC") designate the following individuals as expert witnesses:

1. Matt A. Barreto, Ph.D.
Department of Political Science
University of Washington
Box 353530
Seattle, Washington

Gabriel Ramon Sanchez, Ph.D.
Department of Political Science
University of New Mexico
Box MSC05 3070
Albuquerque, New Mexico

Dr. Barreto and Dr. Sanchez are designated as expert witnesses on behalf of the Veasey-LULAC Plaintiffs and Texas NAACP and MALC Plaintiffs. Dr. Barreto and Dr. Sanchez's joint report and other Rule 26 disclosures are being produced by the Veasey-LULAC Plaintiffs. The joint report addresses the results of a survey of Texas registered and eligible voters.

2. Lorraine Carol Minnite, Ph.D.
Rutgers, State University of New Jersey-Camden
Dept. of Public Policy & Administration
401 Cooper Street, Rm. 102
Camden, New Jersey

Dr. Minnite's report addresses the existence of voter fraud in Texas and nationwide. Dr. Minnite's report is designated "Highly Confidential" pursuant to the Consent Protective Order (Doc. #105) and has been filed separately under seal.

3. Daniel G. Chatman, Ph.D.
Asst. Professor of City & Regional Planning
University of California, Berkeley
410A Wurster Hall
#1850
Berkeley, California

Dr. Chatman's report addresses transportation-related burdens on white, African American and Hispanic populations of obtaining an EIC. Dr. Chatman's report and other Rule 26 disclosures are produced herewith.

Plaintiffs Texas NAACP and MALC hereby cross designate and state that they may rely on any expert witness identified or designated by any other plaintiff or plaintiff-intervenor in this consolidated action.

Date: June 27, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on all counsel of record.

/s/ Michelle Hart Yeary
Michelle Hart Yeary